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Counsel for Defendant
BEAU SANKENE

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

V.

BEAU SANKENE, et al.,

Defendants.

Case No. No. CR 16-00013-3 JSW (KAW)

**STIPULATION AND [PROPOSED] ORDER
TEMPORARILY MODIFYING
CONDITIONS OF PRETRIAL RELEASE
AS MODIFIED**

The Honorable Kandis A. Westmore

Defendant, Beau Sankene, through her counsel, Kathryn Ross, and Assistant United States Attorney, Sheila Armbrust, stipulate and agree that the Court should modify the conditions of Ms. Sankene's release to allow her to travel outside of the Northern District to Merced, California, during the holiday season, from Saturday, November 26, 2016, to January 2, 2016.

On June 10, 2016, Ms. Sankene made an initial appearance in the above captioned case. On the same date, the Court released Ms. Sankene on an unsecured bond. Ms. Sankene has been on pretrial release since that date with only one instance of failure to report as scheduled.

**STIPULATION & [PROPOSED]
ORDER TEMPORARILY MODIFYING
CONDITIONS OF RELEASE**

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2 Ms. Sankene respectfully request that the conditions of her pretrial release be temporarily
3 modified to allow her to travel to Merced to be with her relatives over the holiday season.

4 Her supervising Pretrial Services Officer, Timothy Elder, has no objection to this request.
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6 Government counsel has no objection to this request to temporarily modify Ms. Sankene's
7 pretrial release. The parties agree that all other conditions of Ms. Sankene's pretrial release remain in
8 effect.

9 DATED: November 18, 2016

/S/

10 KATHRYN ROSS
11 Counsel for Beau Sankene

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13 DATED: November 18, 2016

/S/

14 SHEILA ARMBRUST
15 Assistant United States Attorney

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28 STIPULATION & [PROPOSED]
ORDER TEMPORARILY MODIFYING
CONDITONS OF RELEASE
Case No.: CR 16-00013-3 JSW (KAW)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Case No. No. CR 16-00013-3 JSW (KAW)

V.

BEAU SANKENE, et al.,

**[PROPOSED] ORDER TEMPORARILY
MODIFYING CONDITIONS OF PRETRIAL
RELEASE AS MODIFIED**

Defendants

The Honorable Kandis A. Westmore

IT IS ORDERED that Pretrial Services is authorized to allow defendant Beau Sankene to travel out of the Northern District to Merced during the holidays, from November 26, 2016, ending on January 2, 2017. In seeking approval from Pretrial Services, Defendant shall provide dates and addresses for where she will be staying. All other conditions of Ms. Sankene's pretrial release shall remain in effect.

Dated: November 21, 2016

Kandis Westmore
HONORABLE KANDIS A. WESTMORE
United States Magistrate Judge